

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHICKEN SOUP FOR THE SOUL
ENTERTAINMENT, INC. *et al*,¹

Debtors.

Chapter 7

Case No. 24-11442 (MFW)
(Jointly Administered)

Related Doc. No. [508](#), [524](#)

**CERTIFICATION OF COUNSEL REGARDING SUBMISSION OF REVISED ORDER
APPROVING TRUSTEE’S APPLICATION FOR APPROVAL OF RETENTION
OF CULPEPPER IP, LLC AS SPECIAL COPYRIGHT LITIGATION COUNSEL
AND FOR RELATED RELIEF**

I, John T. Carroll, III, counsel to George L. Miller in his capacity as the chapter 7 trustee (the “Trustee”) for the estates (the “Estates”) of the above-captioned debtors (the “Debtors”), hereby certifies the following:

1. On or about December 6, 2024 the Trustee filed the *Trustee's Application for Approval of Retention of Culpepper IP, LLC as Special Copyright Litigation Counsel and for Related Relief* [Docket No. 508] (the “Application”).

2. Since filing the Application, Trustee’s counsel received certain informal comments to the Application from the Office of the United States Trustee (the “OUST”) wherein the OUST requested certain modifications to the proposed Order approving the Application (the “OUST Comments”).

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor’s federal tax identification number (where applicable), are: 757 Film Acquisition LLC (4300); Chicken Soup for the Soul Entertainment Inc. (0811) (“CS Entertainment”); Chicken Soup for the Soul Studios, LLC (9993); Chicken Soup for the Soul Television Group, LLC; Crackle Plus, LLC (9379); CSS AVOD Inc. (4038); CSSESIG, LLC (7150); Digital Media Enterprises LLC; Halcyon Studios, LLC (3312); Halcyon Television, LLC (9873); Landmark Studio Group LLC (3671); Locomotive Global, Inc. (2094); Pivotshare, Inc. (2165); RB Second Merger Sub LLC (0754); Redbox Automated Retail, LLC (0436); Redbox Entertainment, LLC (7085); Redbox Holdings, LLC (7338); Redbox Incentives LLC (1123); Redwood Intermediate, LLC (2733); Screen Media Films, LLC; Screen Media Ventures, LLC (2466); and TOFG LLC (0508). The Debtors’ corporate headquarters and service address is 132 East Putnam Avenue, Floor 2W, Cos Cob, CT 06807.

3. Additionally a response to the Application was filed was by Charles Muszynski, pro se; namely, *Objection to Trustee's Engagement of Special Counsel, Request for Disqualification of Culpepper IP, LLC Pursuant to 105, 327(e), and 328(a) Request for Sanctions* [Filed 12/26/2024; Docket No. 524] (the "Muszynski Objection").

4. A hearing to consider the entry of an order approving the Application was held before the Honorable Mary F. Walrath on January 8, 2025 (the "Hearing") at which time the Court overruled the Muszynski Objection.

5. Trustee's counsel has modified to the proposed Order to the Application to include the OUST Comments and the modifications are acceptable to the OUST and also acceptable to Culpepper IP, LLC, a copy of which is attached hereto as Exhibit "A" (the "Revised Order").

6. A redlined version of the Revised Order against the version as originally filed with the Application is attached hereto as Exhibit "B".

7. Other than the OUST Comments which have been resolved, and the Muszynski Objection which has been overruled, no answer, objection or other responsive pleading to the Application has been filed or received by the Trustee.

8. The undersigned counsel for the Trustee further certifies that I have caused the Court's docket for the Debtors' Estates to be reviewed and no answer, objection or other responsive pleading to the Application appears thereon. Objections to the Application were to be filed and served no later than December 27, 2024.

9. Accordingly, the Trustee respectfully requests entry of the Revised Order attached hereto as Exhibit "A", if acceptable to the Court, at the earliest convenience of the Court.

Dated: January 10, 2025
Wilmington, Delaware

COZEN O'CONNOR

By: /s/ John T. Carroll, III
John T. Carroll, III (DE No. 4060)
1201 N. Market Street
Suite 1001
Wilmington, DE 19801
(302) 295-2028 Phone
(302) 295-2013 Fax No.
jcarroll@cozen.com

*Counsel to George L. Miller,
Chapter 7 Trustee*